

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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<b>UNITED STATES OF AMERICA</b>	:	<b>CR# 13-0164</b>
	:	
v.	:	
	:	
<b>IRINA VASSERMAN</b>	:	

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**MOTION TO MODIFY PRE-TRIAL RELEASE CONDITIONS**

TO THE HONORABLE JUAN R. SANCHEZ, JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA:

AND NOW COMES IRINA VASSERMAN, by and through his attorney, Thomas F. Burke, Esquire, who hereby avers the following facts and requests the following relief:

1. The defendant Irina Vasserman was indicted by a grand jury sitting in the Eastern District of Pennsylvania of conspiracy to commit health care fraud, false statements in health care matters, and kickback payments.
2. On April 16, 2013, the defendant appeared before the magistrate judge and was granted pre-trial release with standard conditions. Among those conditions is a travel restriction confined to the Eastern District of Pennsylvania.
3. The defendant Irina Vasserman has a family vacation planned in Wildwood New Jersey starting July 11<sup>th</sup> and concluding July 15, 2013. The defendant requests this Honorable Court to modify the defendant's conditions of pre-trial release to allow her to travel to Wildwood New Jersey from July 11<sup>th</sup> to July 15<sup>th</sup>.
4. The government has informed counsel for the defense that it would not consent to this modification because, as the defendant has CJA appointed counsel, she therefore should not have the money to go on vacation.
5. The defendant and her family have reservations at the Florentine Family Motel located at 19<sup>th</sup> and Surf Avenues in Wildwood on the days specified above. The family paid for this vacation prior to being indicted and paid a total of \$520.00 via credit card to rent the room.

WHEREFORE, the defendant Irina Vasserman respectfully requests this Court GRANT her Motion to Modify Pre-Trial Release Conditions and allow her to travel to Wildwood New Jersey from July 11<sup>th</sup> to July 15, 2013.

Respectfully submitted,

/s/ Thomas F. Burke, Esquire  
Thomas F. Burke, Esquire  
Counsel for Irina Vasserman

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**ORDER**

**AND NOW**, this \_\_\_\_\_ day of June, 2013, upon consideration of the attached Motion to Modify the Pre-Trial Release Conditions, the defendant's motion is **HEREBY GRANTED**. The defendant may travel to Wildwood New Jersey and stay there from July 11<sup>th</sup> to July 15, 2013. All other conditions of the defendant's pre-trial release remain in effect.

BY THE COURT:

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J.

**CERTIFICATE OF SERVICE**

I, Thomas F. Burke, Esquire, hereby certify that I have served a copy of the foregoing Motion to Modify Pre-Trial Release Conditions by way of the ECF filing system on the following persons:

U.S. Attorney's Office  
c/o AUSA Beth Leahy  
615 Chestnut Street  
Suite 1250  
Philadelphia, PA 19106

DATED: **6/19/13**

/s/ Thomas F. Burke, Esquire  
Thomas F. Burke, Esquire  
Borum, Burke, DiDonato & Voci  
Two Penn Center Plaza – Suite 900  
1500 JFK Blvd.  
Philadelphia, PA 19102